

Message

**From:** Lazos, Pamela [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=15D4F11C6327474BB424A24CBD406E93-PLAZOS]  
**Sent:** 4/8/2021 12:40:26 PM  
**To:** Mastro, Donna [mastro.donna@epa.gov]; Rivera, Nina [Rivera.Nina@epa.gov]  
**Subject:** RE: [External] Civil Action No. 1:15-cv-00291-CCC, Seeking Concurrence for Lower Susquehanna Riverkeeper Association's Motion to Intervene

## Ex. 5 Attorney Client (AC)

**From:** Mastro, Donna <Mastro.Donna@epa.gov>  
**Sent:** Thursday, April 08, 2021 8:18 AM  
**To:** Lazos, Pamela <Lazos.Pamela@epa.gov>; Rivera, Nina <Rivera.Nina@epa.gov>  
**Subject:** RE: [External] Civil Action No. 1:15-cv-00291-CCC, Seeking Concurrence for Lower Susquehanna Riverkeeper Association's Motion to Intervene

## Ex. 5 Attorney Client (AC)

Donna L. Mastro | Deputy Regional Counsel for Enforcement | US EPA Region III ORC | (215) 814-2777 | MOBILE (267) 273-5407

**From:** Lazos, Pamela <Lazos.Pamela@epa.gov>  
**Sent:** Thursday, April 08, 2021 7:49 AM  
**To:** Mastro, Donna <Mastro.Donna@epa.gov>; Rivera, Nina <Rivera.Nina@epa.gov>  
**Subject:** RE: [External] Civil Action No. 1:15-cv-00291-CCC, Seeking Concurrence for Lower Susquehanna Riverkeeper Association's Motion to Intervene

Ah, good question. But we are doing a major modification which will need court approval and probably public comment, right?

**From:** Mastro, Donna <Mastro.Donna@epa.gov>  
**Sent:** Wednesday, April 07, 2021 4:15 PM  
**To:** Lazos, Pamela <Lazos.Pamela@epa.gov>; Rivera, Nina <Rivera.Nina@epa.gov>  
**Subject:** RE: [External] Civil Action No. 1:15-cv-00291-CCC, Seeking Concurrence for Lower Susquehanna Riverkeeper Association's Motion to Intervene

How can they intervene in our action where we have a partial CD? isn't it too late for that?

Donna L. Mastro | Deputy Regional Counsel for Enforcement | US EPA Region III ORC | (215) 814-2777 | MOBILE (267) 273-5407

**From:** Lazos, Pamela <Lazos.Pamela@epa.gov>  
**Sent:** Wednesday, April 07, 2021 4:12 PM  
**To:** Rivera, Nina <Rivera.Nina@epa.gov>; Mastro, Donna <Mastro.Donna@epa.gov>  
**Subject:** FW: [External] Civil Action No. 1:15-cv-00291-CCC, Seeking Concurrence for Lower Susquehanna Riverkeeper Association's Motion to Intervene  
**Importance:** High

Also, this just in. It's sad because EPA was ready to go with this waaaaaay back at the end of 2020 and here we are in April with a citizen suit because of our slowness. According to Devon, they have not made substantive changes to the CD mod so I'm not sure what's holding up the process.

I'm leaving for the rest of the day but will be back in tomorrow.

Thanks,  
Pam

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**From:** Williams, Janna <jannwillia@pa.gov>  
**Sent:** Wednesday, April 07, 2021 12:13 PM  
**To:** Lazos, Pamela <Lazos.Pamela@epa.gov>  
**Cc:** Herb, Dawn <dherb@pa.gov>  
**Subject:** FW: [External] Civil Action No. 1:15-cv-00291-CCC, Seeking Concurrence for Lower Susquehanna Riverkeeper Association's Motion to Intervene  
**Importance:** High

Hi Pam,

We just received the below email from EIP regarding CRW's Consent Decree. Dawn and I would like to have a meeting to discuss. Would you provide some dates and times you and your team are available? I wasn't sure who all to forward to so please feel free to pass this along.

Best,  
Janna Williams

**Janna Williams** | Assistant Counsel  
Office of Chief Counsel | South Central Regional Counsel  
Department of Environmental Protection  
909 Elmerton Avenue | Harrisburg, PA 17110-8200  
Phone: 717.783.8301 | Fax: 717.772.2400  
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**From:** Lisa Widawsky Hallowell <lhallowell@environmentalintegrity.org>  
**Sent:** Wednesday, April 7, 2021 11:38 AM  
**To:** bshuman@pa.gov; Williams, Janna <jannwillia@pa.gov>  
**Cc:** Sylvia Lam <slam@environmentalintegrity.org>  
**Subject:** [External] Civil Action No. 1:15-cv-00291-CCC, Seeking Concurrence for Lower Susquehanna Riverkeeper Association's Motion to Intervene  
**Importance:** High

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Dear Janna:

Pursuant to Local Rule 7.1 of the Local Rules for the United States District Court for the Middle District of Pennsylvania, I am writing on behalf of the Lower Susquehanna Riverkeeper Association ("LSRA") to seek your concurrence for LSRA to move to intervene as a Plaintiff in the matter *U.S. et al v. Capital Region Water*, Civil Action No. 1:15-cv-00291-CCC, in the Middle District of Pennsylvania. In advance of filing LSRA's motion to intervene as a Plaintiff in this action, please let us know your client's position regarding this motion. Beth Shuman is listed as counsel of record, but given that I believe she has retired, I am writing to you since you met with us on this matter – please let me know if there is another attorney for the Department that I should contact.

In addition, there is no counsel of record listed for the City of Harrisburg; do you know if there a counsel contact person for the City of Harrisburg that should be consulted, or has their involvement ceased following their transfer of duties in this matter to CRW?

Thank you for your prompt attention to this request.

Sincerely,

Lisa Widawsky Hallowell  
Senior Attorney  
Environmental Integrity Project  
(202) 294-3282

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